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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

July 24, 2000

SUBJECT: Feasibility Study Report - Operable Unit 2, Sediment, Groundwater, and NAPLs;
Westinghouse Electric (Sharon Plant), Sharon, Pennsylvania; June, 2000

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TO: Vic Janosik (3HS22)
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*Received
7-24-00 by
V. Janosik, RPA*

BTAG has prepared comments on the subject document to help facilitate our upcoming discussions addressing ecological issues at the site.

Sediments

BTAG prefers conventional excavation for all PCB deposits in Areas 14 and 15. In Area 15 (Clark Street Outfall), sediments and riparian soils with concentrations exceeding 1 and 10 ppm, respectively, should be excavated using conventional equipment. In addition, the stormwater sewer must be purged of all contaminated soils/sediments that are coming from the site.

While removal of the sediments is preferred, BTAG will consider the application of an Aquablok cap with gravel cover over deposits containing PCBs at exceeding 1 ppm on the southeast bank near Sharon Tube in Area 14. However, numerous concerns need to be addressed regarding this technique:

- Impacts of the cap on river hydrology
- Impacts of the cap on river uses
- Presence of ground discharges under deposits to be capped
- Advective processes in the area of the deposit
- Protection of the cap in perpetuity (responsible party and activity restrictions)
- Impacts of dam removal on cap stability
- Ability of surface to serve as habitat for invertebrates and fish
- Intensive monitoring plan (due to experimental nature) and its cost
- Back up plan if cap fails (ability to reopen ROD and implement alternative)

On the northwest bank within the Shenango Valley Water Company property, sediments are more accessible from shore and should be excavated to achieve concentrations of less than 1 ppm.

Any locations that are dredged should be filled with suitable material meeting the 1 ppm PCB criteria and background concentrations of other contaminants. Any capped locations must be protected via state regulations against disturbance and monitored for long term integrity.

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Groundwater

Comparison of 1992 and 1999 data indicates that PCB concentrations have declined in groundwater. In contrast to natural attenuation in VOCs and SVOCs, it is highly unlikely that degradation of PCBs is entirely responsible for the difference (3 orders of magnitude) over a period of 7 years. At least in part, the decreased PCB contamination of groundwater is likely to be the result of migration of the contaminated plume downgradient - toward the Shenango River. This potential source of PCBs must be dealt with on site to prevent recontamination of the remediate sediments. This should be included as a remedial action objective for groundwater.

LNAPL

The selected alternative will need to effectively curtail the transfer of contaminants from LNAPL to groundwater and, ultimately, to the Shenango River. It will likely be the result of a combination of extraction and treatment/disposal. If the disposal of treated groundwater is released into the existing stormwater sewers, the PRPs need to provide a detailed plan of how contaminated soils/sediments currently in the sewers will be captured prior to flushing by the discharge. The remedial action objectives should specifically reflect these concerns.

Thank you for the opportunity to provide input on this site. Please feel free to contact me at x2380 or Kathy Patnode at 814-234-4090 x227 if you have any questions.